

### **REMARKS**

Currently Claims 1-33 are pending in the application.

The Examiner, in paragraph 4 of the Official Action, rejected claims 1-6, 11, 12, 17-23 and 28-29 under 35 USC § 102(e) as being anticipated by U.S. Patent 5,649,185 to Antognini et al. for the reasons set forth therein. Applicants respectfully submit that the '185 reference does not teach or suggest the invention as set forth in independent claims 1, 11, 17 and 28 upon which the remaining claims depend at least ultimately.

The present invention is directed to a system, server and method for storing digital images wherein the digital images have a unique access code for selectively identifying the location of a server where one or more images are stored for allowing transmitting of one or more images to a remote computer at a remote location over a communication network. In claim 1, the unique access code is used to identify the location of a server where the images are stored for allowing the viewing and ordering of goods or services with respect to the images stored thereon. The access code allows for quick and easy identification of where the image is stored, such that the images can be quickly located regardless of the number of servers or storage places upon where they may be located. While the '185 reference does disclose the plurality of servers and associated image storage devices, there is no teaching or suggestion of providing an access code as taught and claimed by Applicants, nor does it teach or suggest the ordering of goods or services with respect to the stored images.

The Examiner states that servers 14 and 15 transmit one or more images to remote computers 26 or 28. In this regard, the library client 10 is typically a workstation containing a local store or cache 17 (see column 4, lines 47-49) and as the application program 25 that allow users 26 and 28 to access the server (see column 5, lines 41-45 and column 5, lines 4-13). The Examiner is correct in that column 5, lines 53-59 discloses various orders that may be provided to the library server. Various examples of orders are set forth in Table 1 at column 7, lines 35 through column 8, line 2. However, the identifier in column 6, line 35 is not directed to mapping of the location of the image, but instead is directed to identifying the library client and users. The map is to the value of the token presented. This portion of the disclosure is not directed to an image

identifier. Image identifiers in the cited reference, are discussed as set forth at column 9, lines 33-36. In this portion of the disclosure, the image identifiers are those identifiers created by the client 10 (workstation) at which the users are working. Thus, the image identifiers are numbers that are generated by the user at the workstation. These are not the same as the location of where images are located in the server. In this regard, Applicants refer the Examiner to column 9, line 60 through column 10, line 18. There is a mapping of images in the library server complex 80. In particular, a library catalog table is provided that corresponds essentially to the card catalog of a library in that it lists all the images stored in the library, their location and other information relevant to the library service protocols of the invention (see column 10, lines 1-6). The location field 85(c) identifies where the image is stored (see column 10, line 13).

Column 13, line 1 through column 14 line 40 sets forth the procedure for the storage of images in the library system. Column 14, lines 41-45 discuss the retrieving of the images from the library as being equivalent to the image storage process except the image server and the client move the images in the opposite direction. In this regard, in discussing how the storage of the images occurs, the '185 reference at column 13, lines 43-47 states that the image server maintains an image store catalog 102. When the server receives the requested message, it makes a catalog entry 102a which includes IMAGEID and a pointer to images storage space where the image will be written. It is this pointer that identifies the location of the stored image and not the IMAGEID. In the present invention, as previously set forth, it is the access code that is used to identify the location of server and where the images are stored. This is in contrast to the '185 reference that uses a table and pointers for locating of images. In another differing aspect, the invention, as claimed by Applicants, provides for the ordering of goods and/or services with respect to the stored images. The '185 does not teach or suggest the ability to order goods and services as claimed. Accordingly, it is respectfully submitted that the '185 reference does not disclose or render obvious the claimed invention.

Claim 11 is similar to claim 1 as it is directed to a method for selectively receiving an order for digital images over a communication network. As set forth in paragraph c of claim 11, method includes allowing selective access to one or more digital images from a remote location to a server or a

communication network using the unique access code for viewing of one or more digital images and transmitting them in order during access to the server. Here again, this is not taught or suggested by the prior art.

Claim 17, which is directed to a system for selectively transmitting digital images from one server or communication network to a computer, specifically sets forth one or more images having a unique access code. The access code identifies both the server and where the image is stored and the images. The unique access code is utilized by the computer for locating the server and allowing selective access by the remote computer to the images and ordering of goods.

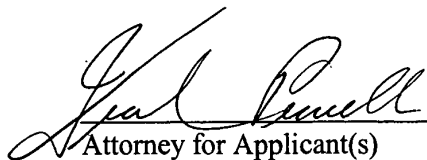
The last independent claim 28 also requires the storing of images using the unique access code and facilitating selective access utilizing the access code for locating the server and one or more images stored thereon. Additionally, all of the independent claims talk about ordering of goods or services. The '185 patent merely discusses the accessing of images. There is no teaching or suggestion of ordering any type of goods with respect to the images. Quite the contrary, since the '185 reference is directed to a library system, it could not teach or suggest such.

In view of the foregoing, it is respectfully submitted that independent claims and their dependent claims are patentably allowable for the reasons set forth above.

The Examiner also rejected claims 7-10, 13-16, 24-27 and 30-33 under 35 USC § 103(a) as being unpatentable over the '185 reference as previously applied and further in view of U.S. Patent 6,243,171 to Haneda for the reasons set forth in paragraph 5. Since all these claims are dependent claims, they are also patentably distinct over the cited art for the same reasons previously discussed with regard to the independent claims upon which they depend.

In view of the foregoing, it is respectfully submitted that the claims in their present form are in condition for allowance and such action is respectfully requested.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Frank Pincelli", written over a horizontal line.

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